

EXHIBIT B

Custodian	Years	Title	Role with Mesh Products	Custodial File issues
Renee Selman	2005 - 2010	Worldwide President	Responsible for setting certain key policies, defining strategy, direction, overall responsibility for the company's actions.	25 documents in custodial. Ethicon admits that it did not maintain her hard drive.
Ramy Mahmoud	2007 - 2010	Chief Medical Officer & Worldwide Vice President of Evidence-Based Medicine	Head of 4 departments - involved in quality board discussions and determinations, including decisions on handling product complaints and post-market surveillance activities of its high-risk products such as the POP and TVT.	27 documents in custodial file. Testified that he complied with all litigation hold notices.
Charlotte Owens	2003 - 2005	Global Medical Director	Product development, marketing and sales, helped to draft the IFU for Prolift, reviewed adverse events, provided information to regulatory agencies about new products.	6 documents in custodial file.
Sean O'Bryan	2001 - 2005	Senior Project Manager - Regulatory Affairs	Submitted annual reports to the FDA, regulatory lead on TVT-Blue and TVT-O, helped to draft the IFU for TVT-O, prepared and submitted the TVT-O 510(k).	54 documents in his custodial file.
Laura Angelini	1991 - present	Vice President of Global Strategic Marketing and other positions	Worked on the TVT from its infancy, from 1997-2005, developing marketing strategies. She was Ethicon's corporate designee to testify as to agreements with Ulf Ivar Ulmsten, one of the original developers of the TVT product; as to amounts paid to Mr. Ulmsten by Ethicon or Medscand, the company for which he worked; and as to services rendered by Mr. Ulmsten or any affiliated entities.	No custodial file from 1997 through 2005. In late 2005, Angelini quit for a few weeks, changed her mind, and then was re-hired in the same position. During that short period (after the TVT litigation hold had been issued), Ethicon destroyed all of those documents by purging her computer of all files.
Jennifer Paine	2004 - 2009	Worldwide Director of Regulatory Affairs and other positions	Worked on the TVT product line from July 2007 - December 2009.	71 documents in custodial file, no emails to or from Paine in her file

Price St. Hillaire	1999 - 2008	Marketing Director and other sales and marketing positions	Product Director of Ethicon's incontinence line.	No custodial file. St. Hillaire does not recall being made aware of a litigation hold during his time at Ethicon, but stated that did not destroy any relevant documents, and he left all of his physical files and his laptop in his office when he left the company.
Cheryl Bogardus	2001 - 2007	Worldwide Marketing Director and other positions	Worldwide Marketing Director, Ethicon Women's Health and Urology.	No custodial file. Bogardus does not recall being told to preserve documents, but she stated that she left all of her paper and electronic documents behind when she left Ethicon. She stated that she sent or received about 100 e-mails per day.
Gregory Jones	1989 - 2003	Worldwide Director of Regulatory Affairs and other regulatory positions	Director of Regulatory Affairs at the time of the TVT-Retrupubic 510(k) submission in 1998, and TVT-AA (blue) 510(k) submission. signed the Truthful and Accuracy Statement required by the Code of Federal Regulations on both submissions.	20 documents in custodial file. Jones kept electronic copies of documents, such as 510Ks, regulatory strategies, FDA correspondence, documents regarding the products of other manufacturers, and audit reports. He was not aware of any effort made to preserve those documents at the time he left.
Rick Isenberg	1999 - 2002	Worldwide Director of Medical Affairs	Medical director with primary responsibility for the TVT product line from 1999-2002.	1 page in HR file. No custodial file.
Patricia Hojnoski	2002 - 2009	Senior Project Manager and contracting position in regulatory affairs	Responsible for TVT-Secur 510K submission to FDA.	6 documents in custodial file. Hojnoski testified that she would have complied with litigation holds and would not have destroyed relevant documents, including handwritten notes.
Jill Schiaparelli	2000 - 2007	Project Director for Strategic Growth	Long-term involvement with "strategic growth" of the Ethicon's mesh products; worked with Dr. Todd Heniford, an advocate of light mesh materials, who is now an Ethicon expert witness.	No custodial file.

Paul Courts	2009 - present or recent	Sales Representative	Sales representative for the first bellwether trial (Carolyn Lewis).	35 documents in custodial file. Courts testified that he had CDs and visual aids that fell within the litigation hold, but he had no idea whether any of it had been preserved.
Troy Mohler	2004 - 2012	Sales Representative	Sold Ethicon's mesh products to physicians.	186 documents in custodial file. Mohler testified that he would not have destroyed any electronic or hardcopy material. He testified that he had physician education materials (slide decks and procedural videos), and that he handed over a binder of all his physician call notes (from 2004 through 2012) when he left the company, but they were not in his custodial file.
Allison London Brown	1997 - 2007	Marketing Director and other positions	Directed launch of first new Pelvic Floor segment, developed and executed worldwide strategy for the Pelvic Floor and Incontinence markets.	No custodial file.
John Clay	2006-2007	Manager, Regulatory Affairs	Principal responsibility for the TVT line of products from 2006-07. Ethicon named him as the primary regulatory person with responsibility for the entire TVT line of products in their official 30b6 response.	No custodial file. Ethicon indicates custodial file does not exist.
Kendra Munchel	2002 - 2005	Global Marketing Manager (05-07) and Manager of Professional Education (02-05)	Member of the "core teams" for professional education for both the TVT-O and Prolift launches.	No custodial file. Ethicon indicates custodial file does not exist.
Tom Divilio	1997 - 2009	Director, Medical Affairs	Heavily involved in TVT projects.	No custodial file. Ethicon has stated that production of his custodial file is complete, and no responsive documents were identified.

Amy Godwin	2000-recent years	Director of Clinical Trial Operations, Associate Director of Clinical Development (prior), Manager of Clinical Studies (prior)	Substantial involvement in clinical affairs with TVT products.	No custodial file. Ethicon has stated that production of her custodial file is complete.
Susanne Landgrebe	2005-present or recent time	Senior Engineer for Discovery Programs	Worked on the matrix materials project and is named on the Patent for the TVT-Secur.	Only 75 documents in custodial file. Ethicon claims that her custodial file has been fully produced, which is implausible considering her involvement with TVT products.
Zenobia Walji	2000 - 2012	Worldwide Director, Strategic Planning (09-12), Director, Strategic Marketing (04-05), Marketing Director (00-04)	Oversaw the “vision and launch” of a pelvic floor platform, developed short-term operational and seven-year strategic plans for core businesses, and was heavily involved in the global launch of Prolift.	A few hundred documents in custodial file. Keyword search of her name returns 4000+ documents, but Ethicon has stated that production of her custodial file is complete.
Nancy Leclair	2000 - 2011	Director, Marketing Services	Held the highest position in marketing services and been there for almost 12 years.	189 documents in custodial file. Ethicon has stated that production of her custodial file is complete.